

Division of Cannabis Regulation

PACKAGING, LABELING AND PRODUCT DESIGN GUIDE

Introduction

The Division of Cannabis Regulation developed this guide to aid licensees with the proper packaging, labeling, and product design of their final marijuana products. Proper packaging, labeling, and product design practices safeguard against accidental use or misuse of final marijuana products and ensure qualifying patients, caregivers, and consumers have the ability to make informed purchases. This guide reviews each rule citation in 19 CSR 100-1.120 and provides clarifying information that licensees should use jointly with 19 CSR 100-1. The information in this guide is for general purposes only and does not, and is not intended to, constitute legal advice or replace the need for Department approval, where applicable. The Department will revise the guide, as needed, to help clarify packaging, labeling, and product design requirements for final marijuana product.

All licensees are responsible for understanding and complying with the final marijuana product packaging, labeling, and product design rules outlined in Article XIV, 19 CSR 100-1.120, and 195.805 RSMo.

Licensees may find additional information and references:

- Article XIV, Section 1
- Article XIV, Section 2
- 19 CSR 100-1
- <u>195.805 RSMo</u>
- Facility Communications and Guidance Webpage

Product and Packaging Design

Per 19 CSR 100-1.120(1), "All marijuana product shall be produced, packaged, and labeled in a manner that protects public health and is not attractive to children." Licensees are responsible for producing final marijuana products in a manner that ensures the protection of public health. Examples of how a licensee might meet this requirement include:

- Using ingredients in marijuana product production that are deemed safe for human consumption;
- Ensuring contact surfaces in marijuana product production, including machines, machine parts and/or consumables and lubricants are deemed safe for contact with marijuana product being produced for human consumption.
- Reviewing the chemical compatibility of contact surfaces, raw ingredients, and marijuana product throughout the production lifecycle;
- Identifying and documenting critical control points and product specifications for each marijuana product SKU, throughout the production lifecycle.

Per 19 CSR 100-1.120(1)(A), "No marijuana product may be manufactured, packaged, or labeled in a false or misleading manner, such as by inaccurately representing product ingredients." This prohibits licensees from creating and/or selling misrepresented marijuana product to another licensee or consumer. This includes but is not limited to:

- Representing a marijuana product as "Live" that was produced using dried and cured marijuana plant material;
- Changing a marijuana product's strain name to a different strain name because the different strain is in higher demand.
- Representing a marijuana product as "strain specific" when a botanical or synthetic terpene blend was added to mimic a specific strain;
- Representing a marijuana product as "strain specific" when it was manufactured using multiple strains;
- Combining multiple strains in a single container and calling it a "new" strain.

Per 19 CSR 100-1.120(1)(B)1, "No marijuana product or packaging may be designed using the shape or any part of the shape of a human, animal, or fruit, including realistic, artistic, caricature, or cartoon renderings." This means the marijuana product itself, the container, and/or any design on the container or product may not contain any item or part of the items listed above. This includes but is not limited to:

- Marijuana product shaped or stamped with animals, fruits or humans or any part of an animal, fruit, or human;
 - Note: Marijuana infused fruit products made of and still in the form of real fruit, such as dehydrated fruit, are not prohibited by this provision.
- Brand or company logos, on marijuana product or packaging, shaped to resemble or include animals, fruits, or humans – or any part of an animal, fruit, or human;
- Images or patterns, on product or packaging, shaped to resemble or include animals, fruits, or humans – or any part of an animal, fruit, or human;
- Packaging or containers shaped to resemble animals, fruits, or humans or any part of an animal, fruit, or human.

Note: Shape of a human includes figures such as an alien or robot. An animal includes mythical creatures such a unicorn or dragon. These figures are not permitted.

Per 19 CSR 100-1.120(1)(B)2, "No marijuana product or packaging may be designed in such a way as to cause confusion between a marijuana product and any product not containing marijuana, such as where marijuana products or packaging are visually similar to any commercially similar product that does not contain marijuana." This means the final marijuana product itself, its container, and/or any design on the container and/or final marijuana product may not resemble the product, container, or designs of a local, state, national, or international brand's product that does not normally contain marijuana. This includes but is not limited to:

 Collaboration with a local, state, national, or international brand to make a visually <u>similar</u> marijuana-infused version of the collaborating brand's product; • Designing a product or package with similar product design or similar branding and imagery as a local, state, national, or international brand.

For example, licensees <u>may not</u> collaborate with a snack manufacturer and use the snack manufacturer's product design/recipe, brand, and logo to produce a visually and commercially similar marijuana-infused snack product.

Licensees may:

- Collaborate with a local, state, national, or international brands to make a final marijuana product that is not commercially similar to the collaborator's product that does not contain marijuana. For example, licensees may collaborate with a snack manufacturer and use the snack manufacturer's brand and/or logo on a vape cartridge flavored like or inspired by a particular snack produced by the manufacturer because these products are not commercially similar. Licensees may also collaborate with a snack manufacturer and use the snack manufacturer's logo on a new marijuana-infused snack, as long as the marijuana-infused snack design does not look like a commercially similar product, and as long as the marijuana product packaging design does not look like a commercially similar product or packaging design in these circumstances would not cause confusion between the marijuana-infused snack and a commercially similar non-marijuana snack.
- Make and brand their own product by introducing it to patients or consumers with its own unique identity as long as it is not easily confused with commercially sold products that do not contain marijuana. For example, licensees may make a marijuana-infused chocolate and peanut butter snack; provided the marijuana-infused chocolate and peanut butter snack's design, package or label is not visually similar to a commercially similar chocolate and peanut butter snack product that does not contain marijuana.

Per 19 CSR 100-1.120(1)(B)3, "All marijuana product packaging, with the exception of marijuana seeds and plants, shall be re-sealable, opaque, and certified as child resistant. Where marijuana product is packaged in a series of containers, the container closest to the product, excluding methods of administration or wrappers, must be compliant with this requirement." This means the product packaging holding the marijuana product itself <u>may not</u>

contain any translucent areas, must be re-sealable, and must be certified child resistant. This includes but is not limited to:

- Bottles holding liquid marijuana product, such as a tincture or beverage, must be re-sealable, opaque, and child resistant.
- Packages holding multiple or individually wrapped marijuana product units for consumption must be re-sealable, opaque, and child resistant. This includes items such as a lollipop or honey stick.
- Packages holding dried, unprocessed marijuana, concentrates, prerolls, and infused prerolls, must be re-sealable, opaque, and child resistant.

Note: Licensees <u>may</u> use containers that have instructions advising consumers how to open the child resistant container. For example, a child resistant threaded cap that states "Push Down and Turn" is allowed as these instructions are part of the container. Licensees <u>may not</u> add these instructions to the container if not already present on the container from the container manufacturer or distributor.

Per 19 CSR 100-1.120(1)(B)4, "All marijuana product packaging, with the exception of marijuana seeds and plants, shall be constructed from FDA-approved food contact substances. Where marijuana product is packaged in a series of containers, the container closest to the product, including methods of administration or wrappers, must be compliant with this requirement, unless the department approves application of this rule to a different container in the series." This means the product packaging that touches the final marijuana product must be manufactured from materials that are deemed safe to contact products made for human consumption. Additional information regarding the FDA's *Inventory of Food Contact Substances Listed in 21 CFR* can be found here.

Per 19 CSR 100-1.120(1)(B)5, "All marijuana product packaging design, including that for exit packaging, may only utilize—

A. Limited colors, including a primary color as well as up to two (2) logos or symbols of a different color or colors, whether images or text, including brand, licensee, or company logos, provided that the widest part of a logo or symbol is no wider than the length or height, whichever is greater, of the word 'Marijuana' on the packaging;"

 "Limited colors" means that the entire package must be limited to only one main color and any additional colors that are part of up to two logos.

- "Primary color" means the single color of the package, which can be any solid color, and not limited to the "primary" colors of red, yellow, or blue.
- The primary color <u>may not</u> include patterns or additional shades/gradients of the packaging's chosen primary color.
- The two (2) logos or symbols allowed on packaging <u>may</u> include patterns and/or additional colors.
- The two (2) logos or symbols allowed on packaging <u>may not</u> include animals, fruits, or humans or any part of an animal, fruit, or human.
- The word "Marijuana" is required to be clear and conspicuous on every layer of packaging per 19 CSR 100-1.120(1)(C)1.
 - Note: Clear and conspicuous means the word "Marijuana" must be legible, at least as large as any other words used on that layer of packaging, on a single line of text, and on the principal display panel, where applicable. See the FDA's <u>Food</u> <u>Labeling Guide</u>, <u>Dietary Supplement Labeling Guide</u>, or <u>Cosmetic Labeling Guide</u> for additional principal display panel information.

"B. A product name;"

- Product name is the common or usual name of the product. This is a
 descriptive name for the product and is analogous with the FDA's
 statement of identity. See the FDA's <u>Food Labeling Guide</u>, <u>Dietary</u>
 <u>Supplement Labeling Guide</u>, or <u>Cosmetic Labeling Guide</u> for
 additional statement of identity information.
- Product name <u>may only</u> use black or white font.

"C. Text indicating side effects and behavioral effects of usage;"

- Text <u>may not</u> make any unfounded nutritional, health, structure/function, and/or implied claims.
- Text must communicate clearly the side effects and behavioral effects and may not be a slogan or other statement of aspirational or ambiguous meaning.
- Text <u>may only</u> use black or white font.
- "D. A label required by this rule;"
 - Label design and requirements are outlined in 19 CSR 100-1.120(1)(C).
 - Label may only be black and white.

"E. A QR code linking to a website where a purchaser can learn more about the product;"

- QR code <u>may not</u> include a logo or image.
- QR code may only be black or white.

Note: Exit bags will not be approved for compliance through the Item Approval process, but are required to be in compliance with 19 CSR 100-1.120(1)(B)5.

A visual representation of 19 CSR 100-1.120(1)(B)5 requirements can be found in **Appendix A** of this guide.

Per 19 CSR 100-1.120(1)(B)6, "Marijuana product packaging must be in compliance with applicable local, state, and federal requirements." This means licensees are responsible for understanding and adhering to all local, state, and federal product packaging requirements for final marijuana product SKUs created in their licensed facility. Applicable packaging requirement may include but is not limited to:

- Tamper evident seals
- Chemical safety
- Conditions of use

Note: Approval of a final marijuana product through the Item Approval process does not confirm compliance with applicable local, state, and federal requirements and is only specific to compliance with DCR rule requirements within 19 CSR 100-1.120(1).

Per 19 CSR 100-1.120(2), "Prior to use, all marijuana product designs, packaging designs, and label designs must be submitted to the department for review of compliance with section (1) of this rule." This means licensees are responsible for ensuring compliant product, packaging and labeling designs of final marijuana products. Licensees are also responsible for obtaining Department approval of marijuana product, packaging, and labeling designs.

Note: Each individual licensee must receive approval for each different final marijuana product SKU produced by the licensee.

Per 19 CSR 100-1.120(3), "All marijuana product shall be compliantly packaged and labeled by the cultivation, manufacturing, or microbusiness wholesale facility providing the final marijuana product for sale except where cultivation or microbusiness wholesale facilities are providing dried, unprocessed marijuana to dispensary licensees for use in creating prerolls or for dispensing directly to consumers or qualifying patients in custom amounts. In such a case, the dispensary facility is responsible for ensuring the product is compliantly packaged and labeled prior to sale." This means,

- Where a cultivation licensee is providing plants, seeds, buds, or any other marijuana product intended to be a final marijuana product, the cultivation licensee is responsible for compliantly packaging and labeling the final marijuana product.
 - Cultivation licensees do not need to comply with the packaging and labeling requirements if the product provided to a dispensary licensee is intended to be used to create prerolls at the dispensary facility or if the product is dried, unprocessed marijuana intended to be dispensed in custom amounts, commonly referred to as "deli style", at the dispensary facility.
- Where a manufacturing licensee is processing marijuana product to create a final marijuana product, the manufacturing licensee is responsible for compliantly packaging and labeling the final marijuana product.
- Where a dispensary licensee is creating prerolls or dispensing custom amounts of dried, unprocessed marijuana, the dispensary licensee is responsible for compliantly packaging and labeling the final marijuana product.

Per 19 CSR 100-1.120(4), "Final marijuana product shall not be packaged in a manner that exceeds three (3) ounces of dried, unprocessed marijuana, or its equivalent." This means,

- Dried, unprocessed marijuana may not be packaged in an amount greater than 3 ounces.
- Concentrates may not be packaged in an amount greater than 24.3 grams.
- Infused products may not be packaged in an amount greater than 2,431 milligrams.

Per 19 CSR 100-1.120(5), "Product packaging may not be designed in a manner such that the required elements for packaging and labeling are easily removed or separated from the package, such as placing required information on part of the package that must be removed in order to access the product." This means "Marijuana", the universal symbol, and the required label must be affixed to the packaging holding the marijuana product itself in such a way that would make it difficult for a patient or consumer to remove. For example, this information may not be affixed to a tamper-evident seal.

Per 19 CSR 100-1.120(6), "Any violation of this rule shall be punishable by an appropriate and proportional department sanction, up to and including an administrative penalty of five thousand (\$5000) dollars for each product/packaging category, identified by approval number, in which a requirement is violated."

Product Labeling

Per 19 CSR 100-1.120(1)(C), "Except as specifically identified herein, labeling requirements apply to containers, wrappers, packages, and methods of administration that contain marijuana product, except seeds or plants. The labels required herein are not required on the paper for prerolls." Label requirements for seeds and plants are outlined in 19 CSR 100-1.120(1)(C)3.

Per 19 CSR 100-1.120(1)(C)1, "Unless alternative placement of "Marijuana" or the universal symbol has been approved by the department, all marijuana product shall be clearly and conspicuously labeled with "Marijuana" printed at least as large as any other words used, as well as a prominently displayed universal symbol in red and white print that consists of the following: a diamond containing the letters "THC"; the letter "M" located under the "THC" within the diamond; and for infused products, the number of milligrams of THC in the package, placed directly under the diamond." This means,

- This requirement <u>does not</u> apply to seeds, plants, or the paper used to make prerolls.
- "Marijuana" <u>and</u> the universal symbol are required on every layer of marijuana product packaging, including containers, wrappers, packages,

- and methods of administration, including a crutch or filter if present on a preroll.
- A licensee may request approval for placement of "Marijuana" or the universal symbol to be different from that required in rule. If a licensee believes this requirement cannot be met for a particular method of administration or layer of packaging, a licensee may request this alternative placement during the review and approval process.

A visual representation of universal symbol requirements can be found in **Appendix B** of this guide.

Per 19 CSR 100-1.120(1)(C)2, "Unless alternative placement of a label has been approved by the department, the marijuana product container closest to the product shall bear a label displaying only the following information, in the following order, from top to bottom and left to right." This means,

- This requirement does not apply to seeds, plants, or the paper used to make prerolls.
- The container closest to the product includes wrappers, but does not include paper for prerolls.
- A licensee may request approval for placement of the label to be different from that required in rule. If a licensee believes this requirement cannot be met for a particular method of administration or layer of packaging, a licensee may request this alternative placement during the review and approval process.
- The order of information shall be consistent regardless of placement on the container.

Required label information is clarified further below, and visual label representations can be found in **Appendix C** of this guide.

Per 19 CSR 100-1.120(1)(C)2.A, the label requires "All active and other ingredients, which shall not include groupings of ingredients that obscure the actual ingredients, such as 'natural flavors' or 'botanically derived terpenes' and shall include solvents used in the manufacturing process." This means,

 Licensees are required to list out <u>all</u> ingredients used in their final marijuana product, in descending order of predominance for each ingredient.

- Ingredient lists <u>must</u> include solvents used in the manufacturing of marijuana concentrates and any marijuana concentrates used in the production of final marijuana product. This includes but is not limited to:
 - Butane
 - Propane
 - Ethanol
 - CO2
 - Hexane
 - Pentane
- Ingredient list examples include but are not limited to:
 - Marijuana tetrahydrocannabinol (THC) Distillate (CO₂ Extracted Marijuana Oil (Ethanol), Hexane)
 - Butane Hash Oil (BHO) (Butane, Propane)
 - Hemp Cannabidiol (CBD) Isolate (Ethanol Extracted Hemp Oil, Pentane)
 - Lime Flavoring (Sunflower Seed Oil, Distilled Lime Terpenes)
 - Blue Dream Blend Botanically Derived Terpenes (Myrcene, Alpha-Pinene, Beta-Caryophyllene, Beta-Pinene, D-Limonene, Alpha-Bisabolol, Alpha-Cedrene, Alpha-Humulene, Alpha-Phellandrene, Alpha-Terpinene, Alpha-Terpineol, Camphene, Camphor, Cis-Ocimene, Fenchol, Geraniol, Isoborneol, Linalool, L-Menthol, Nerol, Sabinene, Terpinolene, Trans-Ocimene, Valencene, Benzoin, Citral Diethyl Acetal, Citronellol, Delta-3-Carene).

Per 19 CSR 100-1.120(1)(C)2.B, the label requires "Servings and doses per package for marijuana licensees or doses per package for medical licensees." This means marijuana products produced by comprehensive or microbusiness licensees shall be labeled with both servings and doses. Marijuana products produced by medical licensees shall be labeled with doses only.

Note: Serving and dosage amounts should be identical if both are required on the label.

Per 19 CSR 100-1.120(1)(C)2.C, the label requires "A "best if used by" date." Licensees must have supporting evidence for the "best if used by" date listed on a marijuana product's label. For example, licensees may conduct a direct or accelerated shelf life study, challenge test or predictive microbiology to help support the listed "best if used by" date.

Per 19 CSR 100-1.120(1)(C)2.D, the label requires "The license number of the licensed entity from which the final marijuana product originated." This means the label must list the full license number, not the name, for the licensee providing the final marijuana product. The licensed entity providing the final marijuana product is typically either a cultivation or manufacturing licensee. Where cultivation licensees provide dried, unprocessed marijuana to a dispensary licensee for use in creating prerolls or for dispensing directly to consumers or qualifying patients in custom amounts, the dispensary licensee is the originating facility. This is consistent with 19 CSR 100-1.120(3), which identifies the entity responsible for providing the compliant packaging and labeling of the final marijuana product.

Per 19 CSR 100-1.120(1)(C)2.E, the label requires "The testing licensee where the final marijuana product passed mandatory testing." This means the label must list the full license number, not the name, for the testing licensee. Example: "TES000021".

Per 19 CSR 100-1.120(1)(C)2.F, the label requires "The statewide track and trace system tag number associated with the mandatory testing results for the final marijuana product." This requirement refers to the package tag number assigned to the sample collected by the testing licensee and sent for mandatory testing. This package tag number is visible to all downstream licensees in the statewide track and trace system, Metrc.

Per 19 CSR 100-1.120(1)(C)2.G, the label requires "The exact total weight of the marijuana included in the package. For dried, unprocessed marijuana, concentrates, prerolls, and infused prerolls, weight shall be listed in grams. For infused products other than infused prerolls, weight shall be listed by milligrams of delta-9 tetrahydrocannabinol." This means,

- Licensees <u>may not</u> intentionally overfill retail marijuana packages.
- Per 19 CSR 100-1.130(1)(C)4, licensees are expected to use scales designed for the type of weighing or measuring needed for the licensee's processes.
 - For example, scales used for "gramming" out concentrates or prepacking flower with a readability of 0.5 gram and a linearity +/- 1 gram would not be appropriate for these tasks.

Per 19 CSR 100-1.120(1)(C)2.H, the label requires "The exact delta-9-tetrahydrocannabinol (Δ 9-THC), delta-9-tetrahydrocannabinolic acid (Δ 9-THCA), cannabidiol (CBD), cannabidiolic acid (CBDA), cannabinol (CBN), tetrahydrocannabivarin (THCV), cannabidivarin (CBDV), and delta 8 tetrahydrocannabinol (Δ 8-THC) per serving/dose, listed in milligrams." This means all final marijuana product must list the exact potency for each cannabinoid listed in rule. Cannabinoid potency listed on the label must match the mandatory test results uploaded in the statewide track and trace system, Metrc, and the certificate of analysis (COA) provided by the testing licensee for the package tag number associated with the mandatory testing.

Per 19 CSR 100-1.120(1)(C)2.I, the label requires "The results of terpene analysis, if tested during mandatory testing." This means,

- Terpene analysis is <u>optional</u>. However, if terpene analysis is conducted during mandatory testing, the results are required to be included on the label.
- If a licensee wishes to include the results of a terpene analysis on the label, the terpene analysis must be conducted on the representative sample collected by the testing licensee for mandatory testing. A licensee may not send a separate sample to a testing licensee for independent terpene analysis and include the results on the label.
- It is the licensee's responsibility to request terpene testing prior to the package tag being sampled for mandatory testing by the testing licensee. The requesting licensee must request terpene testing on the chain of custody and in the statewide track and trace system, Metrc.
- Terpene results listed on a label must match the mandatory test results uploaded in the statewide track and trace system, Metrc, and the certificate of analysis (COA) provided by the testing licensee.

Per 19 CSR 100-1.120(1)(C)2.J, the label requires "Instructions for use." This means licensees are responsible for declaring how consumers should administer the final marijuana product.

Per 19 CSR 100-1.120(1)(C)2.K, the label requires an "Estimated length of time the serving or dosage will have an effect." This means licensees are responsible for informing the final marijuana product's consumer approximately how long a

single serving and/or dose will have an effect. Licensees may express this length of time in a range, as cannabis can affect people differently.

Per 19 CSR 100-1.120(1)(C)2.L, the label requires "The department-issued product packaging approval number." This means licensees are required to list the approval number assigned to the licensee's final marijuana product SKU during the Item Approval process outlined in 19 CSR 100-1.120(2). The Item Approval process is discussed later in this guide.

Per 19 CSR 100-1.120(1)(C)2.M, the label requires "The following warning: "Cognitive and physical impairment may result from the use of marijuana. Keep out of reach of children." This means this warning must be <u>verbatim</u> and listed as the last item on a final marijuana product's label.

Per 19 CSR 100-1.120(1)(C)3, "Marijuana seeds and plants shall be clearly and conspicuously labeled with "Marijuana" printed at least as large as any other words used on the packaging and a universal symbol designed as described in this rule. Marijuana seed packaging must bear a label with the strain information. Marijuana plant packaging must bear a label with the strain information and propagation date." This means other label information stated in 19 CSR 100-1.120(1)(C)2.A-M is neither required on marijuana seed or plant packages nor allowed per 19 CSR 100-1.120(1)(C)4.

Per 19 CSR 100-1.120(1)(C)4, "Marijuana product packaging may not contain any information other than that specifically required by this subsection, except information to be in compliance with applicable local, state, and federal requirements." This means licensees are responsible for understanding and adhering to all local, state, and federal product labeling requirements for items produced in their licensed facility. Products packaged for retail sale must be labeled in an appropriate manner applicable to the individual marijuana product; examples of local, state, and federal packaging requirements may include, but are not limited to:

- Nutritional information
- Allergens
- Placement of information on packaging
- Net quantity statements
- Irradiation

Note: Approval of a final marijuana product through the Item Approval process does not constitute compliance with applicable local, state, and federal requirements and is only specific to compliance with DCR rule requirements within 19 CSR 100-1.120(1).

Item Approval Process

Per 19 CSR 100-1.120(2), "Prior to use, all marijuana product designs, packaging designs, and label designs must be submitted to the department for review of compliance with section (1) of this rule." This means each final marijuana product SKU created in a "Final Packaging" item category <u>must</u> receive approval from DCR prior it being used to tag a final marijuana product. This process is the Item Approval Process. Licensees <u>shall not</u> submit exit packaging for an Item Approval number, however exit packaging must comply with the design requirements of 19 CSR 100-1.120(1)(B)5.

Note: Licensees may create and submit "Final Packaging" items for review prior to producing or manufacturing the final marijuana product on a scale for distribution.

Per 19 CSR 100-1.120(2)(A), "Submission must be made through a department provided, web-based system by the licensee that is responsible for ensuring compliant packaging and labeling, pursuant to section (3) of this rule." At this time, the Department-provided, web-based system is the statewide track and trace system, Metrc. Therefore, each final marijuana product SKU produced by a licensee must be submitted by the licensee through Metrc.

Note: Beginning September 1, 2023, the creation of a new item in the "Final Packaging" categories will cause automatic submission of the item for approval. In addition to the information required in Metrc, licensees will be required to provide supporting documentation including final marijuana product ingredient specification sheets, child-resistant certifications, verification of FDA-approved food contact compliance, etc. Licensees will upload the supporting documentation separately. After submission through Metrc, a DCR facility specialist will provide the licensee a list of required supporting documentation

and link specific for each "Final Packaging" submission to upload the supporting documentation.

Per 19 CSR 100-1.120(2)(B), "Within thirty (30) days of submission, the department will communicate in writing to the licensee whether the submission is complete. If deemed incomplete, the department will identify reasons why it determined the submission is incomplete and will deny the application. If deemed complete, the submission will be approved or denied within sixty (60) days of the original submission." This means,

- If DCR denies a licensee's application for being incomplete, the licensee will be required to resubmit a complete application for review. A complete application means a licensee provided all necessary items to review the submission for compliance, including any required supporting documentation.
- Information submitted in an application, whether approved or denied, will
 not be maintained by DCR to be applied to a subsequent or resubmitted
 application.
- When a licensee resubmits an application, DCR's initial thirty (30) calendar day timeframe restarts.
- DCR has sixty (60) calendar days from the date of submission to approve or deny the application.

Per 19 CSR 100-1.120(2)(C), "Once a design has been approved, the licensee will receive an approval number for the marijuana product, packaging, and label design, as a whole." This means,

- The statewide track and trace system, Metrc, will assign a unique approval number for each final marijuana product as a whole.
- Licensees shall display this number on the final marijuana product's required label per 19 CSR 100-1.120(1)(C)2.L.
- A unique approval number is required for each final marijuana product SKU. For example, if a licensee manufactures two (2) marijuana-infused cookie SKUs of different flavors, each with a potency of 10 mg, the licensee will need to provide a separate application for each marijuana-infused cookie that includes the marijuana product, packaging, and label design.

Item Categories

Item Categories in the statewide track and trace system, Metrc, are the acceptable list of categories that licensees can choose from when creating items. Licensees can create an unlimited number of items, also known as marijuana products or marijuana product SKUs.

Many item categories below mention a method of administration. A method of administration is when the packaging or container closest to the cannabis product is necessary for intended consumption. Examples of methods of administration include but are not limited to, prerolls, infused prerolls, vape cartridges, infused product dropper, and tea bags. A beverage container may not be considered a method of administration as it not necessary for intended consumption, as it may not be consumed directly from the container.

Below is the list of DCR's item categories available in the statewide track and trace system, the item category requirements, and a description of how each item category shall be used. Any item category that has "(Final Packaging)" after the name should not be selected for mandatory testing, as mandatory testing should have already occurred when "Final Packaging" is selected.

Biomass

- Licensees may use this category for multi-strain marijuana plant material in bulk packaging that will go through an extraction process.
- Licensees may not submit this item category for mandatory testing.

Bud/Flower

- Licensees may use this category for strain specific bud/flower in bulk packaging that require further processing; such as untrimmed bud/flower or harvest lots of bud/flower in the curing process.
- Licensees may use this category for strain specific bud/flower in bulk packaging that has that has been dried, cured, trimmed and sorted into the licensee's desired bud/flower classifications (such as A, B or C buds), harvest lot size, and is awaiting mandatory testing.
- Licensees may submit this item category for mandatory testing.

- Licensees may use this category for strain specific bud/flower that has
 passed mandatory testing and packaged into bulk containers that
 will be sent to a dispensary licensee for sale or distribution directly to
 patients, caregivers, or consumers in custom amounts. Direct
 distribution in custom amounts is commonly referred to as "deli-style".
- Where marijuana product will be sold in a method of administration, the marijuana product must be processed into its method of administration before it is a final marijuana product from which mandatory samples shall be taken; such as pre-filled glass blunts or prerolls.
- At the time of item creation, this item category requires:
 - Strain name (no abbreviations)

Bud/Flower (Final Packaging)

- Licensees may use this category for strain specific bud/flower that has
 passed mandatory testing and packaged into individual containers
 that will be sent to a dispensary licensee for sale or distribution to
 patients, caregivers, or consumers.
- Licensees may not use a production batch when creating packages with this item category.
- At the time of item creation, this item category requires:
 - Strain name (no abbreviations)
 - Method of administration
 - Serving size
 - Number of doses
 - o Public ingredients

Concentrate

- Licensees may use this category for marijuana concentrates in bulk packaging that require further processing; such as raw extracts, mother liquors, or product formulations.
- Licensees may use this category for marijuana concentrates in bulk packaging that will be used as a raw ingredient in other marijuana products, such as distillate or isolate.
- Licensees may use this category for marijuana concentrates in bulk packaging that include all ingredients whether or not the ingredients contain cannabinoids and is awaiting mandatory testing.
- Licensees may submit this item category for mandatory testing.

 Where marijuana will be sold in a method of administration, the marijuana product must be processed into its method of administration before it is a final marijuana product from which mandatory samples can be taken, such as vape cartridges, syringes or other metered dosing tools.

Concentrate (Final Packaging)

- Licensees may use this category for concentrate that has passed mandatory testing and packaged into individual containers that will be sent to a dispensary licensee for sale or distribution to patients, caregivers, or consumers.
- Licensees may not use a production batch when creating packages with this item category.
- At the time of item creation, this item category requires:
 - Method of administration
 - Unit weight
 - Serving size
 - Number of doses
 - Public ingredients

Fresh Frozen Plant

- Licensees may use this category for wet, uncured, strain specific plant material in bulk packaging that will go through an extraction process.
- Licensees may not submit this item category for mandatory testing.
- At the time of item creation, this item category requires:
 - Strain (no abbreviations)

Ground Bud/Flower

- Licensees may use this category for multi-strain or strain specific bud/flower in bulk packaging that has been ground and requires further processing; such as into a preroll or infused preroll.
- Licensees may use this category for strain specific bud/flower in bulk packaging that has been dried, cured, trimmed, in the licensee's desired harvest lot size, has been ground and is awaiting mandatory testing.
- Licensees may submit this item category for mandatory testing.
- Where marijuana will be sold in a method of administration, the marijuana product must be processed into its method of administration

before it is a final marijuana product from which mandatory samples can be taken; such as pre-filled glass blunts or prerolls.

Ground Bud/Flower (Final Packaging)

- Licensees may use this category for strain specific bud/flower that has been ground, passed mandatory testing, and packaged into individual containers that will be sent to a dispensary licensee for sale or distribution to patients, caregivers, or consumers.
- Licensees may not use a production batch when creating packages with this item category.
- At the time of item creation, this item category requires:
 - Strain name (no abbreviations)
 - Method of administration
 - o Serving size
 - Number of doses
 - o Public ingredients

Ground Shake/Trim

- Licensees may use this category for multi-strain or strain specific shake/trim in bulk packaging that has been ground and requires further processing; such as into a preroll or infused preroll.
- Licensees may use this category for strain specific shake/trim in bulk packaging that has been dried, cured, trimmed, in the licensee's desired harvest lot size, has been ground and is awaiting mandatory testing.
- Licensees may submit this item category for mandatory testing.
- Where marijuana will be sold in a method of administration, the marijuana product must be processed into its method of administration before it is a final marijuana product from which mandatory samples can be taken; such as pre-filled glass blunts or prerolls.

Ground Shake/Trim (Final Packaging)

- Licensees may use this category for strain specific shake/trim that has been ground, passed mandatory testing, and packaged into individual containers that will be sent to a dispensary licensee for sale or distribution to patients, caregivers, or consumers.
- Licensees may not use a production batch when creating packages with this item category.
- At the time of item creation, this item category requires:
 - Strain (no abbreviations)
 - Method of administration
 - Serving size
 - Number of doses
 - Public ingredients

Immature Plants

- Licensees may use this category for strain specific immature plants in bulk packaging that will be sold to another licensed cultivation facility.
- Licensees may not submit this item category for mandatory testing.
- At the time of item creation, this item category requires:
 - Strain (no abbreviations)

Immature Plants (Final Packaging)

- Licensees may use this category for strain specific immature plants
 packaged into individual containers ordered by a dispensary licensee
 for distribution to a qualified consumer or patient cultivator.
- At the time of item creation, this item category requires:
 - Strain (no abbreviations)

Infused Edible

- Licensees may use this category for bulk infused edibles undergoing a
 resting period, such as chocolates or gummies setting in molds or soft
 gels in the drying process.
- Licensees may use this category for bulk infused edibles that include all ingredients whether or not the ingredients contain cannabinoid and is awaiting mandatory testing.
- Licensees may submit this item category for mandatory testing.

- Where marijuana will be sold in a method of administration, the marijuana product must be processed into its method of administration before it is a final marijuana product from which mandatory samples can be taken, such as teas in steeping bags or infused product in bottles where administration is by dropper.
- At the time of item creation, this item category requires:
 - Method of administration
 - Unit CBD content
 - Unit CBD content dose
 - Unit THC content
 - Unit THC content dose
 - Serving size
 - Number of doses
 - Public ingredients

Infused Edible (Final Packaging)

- Licensees may use this category for an infused edible that has passed mandatory testing and packaged into individual containers that will be sent to a dispensary licensee for sale or distribution to patients, caregivers, or consumers.
- Licensees may not use a production batch when creating packages with this item category.
- At the time of item creation, this item category requires:
 - Method of administration
 - Unit CBD content
 - Unit CBD content dose
 - Unit THC content
 - Unit THC content dose
 - Unit weight
 - o Serving size
 - Number of doses
 - Public ingredients

Infused Non-Edible

Licensees may use this category for an infused non-edible undergoing
 a resting period, such as topicals setting in application tubes.

- Licensees may use this category for infused non-edibles in bulk packaging that include all ingredients whether or not the ingredients contain cannabinoid and is awaiting mandatory testing.
- Licensees may submit this item category for mandatory testing.
- Where marijuana will be sold in a method of administration, the marijuana product must be processed into its method of administration before it is a final marijuana product from which mandatory samples can be taken, such as lip balm.
- At the time of item creation, this item category requires:
 - Method of administration
 - Unit CBD content
 - Unit CBD content dose
 - Unit THC content
 - Unit THC content dose
 - Serving size
 - Number of doses
 - Public ingredients

Infused Non-Edible (Final Packaging)

- Licensees may use this category for an infused non-edible that has
 passed mandatory testing and packaged into individual containers
 that will be sent to a dispensary licensee for sale or distribution to
 patients, caregivers, or consumers.
- Licensees may not use a production batch when creating packages with this item category.
- At the time of item creation, this item category requires:
 - Method of administration
 - Unit CBD content
 - Unit CBD content dose
 - Unit THC content
 - Unit THC content dose
 - Unit weight
 - o Serving size
 - Number of doses
 - Public ingredients

Infused Preroll

- Licensees may use this category for bulk infused prerolls that includes all ingredients whether or not the ingredients contain cannabinoid and is awaiting mandatory testing.
- Licensees may submit this item category for mandatory testing.
- Where marijuana will be sold in a method of administration, the marijuana product must be processed into its method of administration before it is a final marijuana product from which mandatory samples can be taken, such as the category's namesake an infused preroll.
- At the time of item creation, this item category requires:
 - Method of administration
 - o Unit weight
 - Serving size
 - Number of doses
 - Public ingredients

Infused Preroll (Final Packaging)

- Licensees may use this category for an infused preroll that has passed mandatory testing and packaged into individual containers that will be sent to a dispensary licensee for sale or distribution to patients, caregivers, or consumers.
- Licensees may not use a production batch when creating packages with this item category.
- Infused Prerolls will be sold to patients at a concentrate allotment rate.
 - A 1 gram infused preroll is equal to 1 gram of concentrate which is equal to 3.5 grams of flower. All three are 1 MME from a patient's allotment.
- At the time of item creation, this item category requires:
 - Method of administration
 - o Unit weight
 - o Serving size
 - Number of doses
 - Public ingredients

Raw Preroll

- Licensees may use this category for bulk raw prerolls that include all ingredients, whether or not the ingredients contain cannabinoid, and is awaiting mandatory testing.
- Licensees may submit this item category for mandatory testing.
- Where marijuana will be sold in a method of administration, the marijuana product must be processed into its method of administration before it is a final marijuana product from which mandatory samples can be taken, such as the category's namesake a raw preroll.
- At the time of item creation, this item category requires:
 - Method of administration
 - o Unit weight
 - o Serving size
 - Number of doses
 - o Public ingredients

Raw Preroll (Final Packaging)

- Licensees may use this category for a raw preroll that has passed mandatory testing and packaged into individual containers that will be for sale or distribution to patients, caregivers, or consumers.
- Licensees may not use a production batch when creating packages with this item category.
- At the time of item creation, this item category requires:
 - Method of administration
 - Unit weight
 - o Serving size
 - Number of doses
 - o Public ingredients

Seeds

- Licensees may use this category for strain specific seeds in bulk packaging that will be sold to another licensed cultivation facility.
- Licensees may not submit this item category for mandatory testing.
- At the time of item creation, this item category requires:
 - Strain name (no abbreviations)

Seeds (Final Packaging)

- Licensees may use this category for strain specific seeds packaged into <u>individual</u> containers ordered by a dispensary licensee for distribution to a qualified consumer or patient cultivator.
- At the time of item creation, this item category requires:
 - Strain name (no abbreviations)

Shake/Trim

- Licensees may use this category for strain specific shake/trim in bulk packaging that requires further processing; such as manufacture into a preroll or extract into a concentrate.
- Licensees may use this category for strain specific shake/trim in bulk packaging that has been dried, cured, trimmed, and sorted into the licensee's desired shake/trim classifications and harvest lot size, and is awaiting mandatory testing.
- Licensees may submit this item category for mandatory testing.
- Where marijuana will be sold in a method of administration, the marijuana product must be processed into its method of administration before it is a final marijuana product from which mandatory samples can be taken from; such as pre-filled glass blunts or prerolls.
- At the time of item creation, this item category requires:
 - Strain name (no abbreviations)

Shake/Trim (Final Packaging)

- Licensees may use this category for strain specific shake/trim that has
 passed mandatory testing and packaged into individual containers
 that will be sent to a dispensary licensee for sale or distribution to
 patients, caregivers, or consumers.
- Licensees may not use a production batch when creating packages with this item category.
- At the time of item creation, this item category requires:
 - Strain name (no abbreviations)
 - Method of administration
 - o Serving size
 - Number of doses
 - Public ingredients

Vape Cartridge

- Licensees may use this category for bulk vape cartridges that include all ingredients, whether or not the ingredients contain cannabinoids, and are awaiting mandatory testing.
- Licensees may submit this item category for mandatory testing.
- Where marijuana will be sold in a method of administration, the marijuana product must be processed into its method of administration before it is a final marijuana product from which mandatory samples can be taken, such as the category's namesake a vape cartridge.
- At the time of item creation, this item category requires:
 - Method of administration
 - Unit weight
 - Serving size
 - o Number of doses
 - Public ingredients

Vape Cartridge (Final Packaging)

- Licensees may use this category for a vape cartridge that has passed mandatory testing and packaged into individual containers that will be sent to a dispensary licensee for sale or distribution to patients, caregivers, or consumers.
- Licensees may not use a production batch when creating packages with this item category.
- At the time of item creation, this item category requires:
 - Method of administration
 - o Unit weight
 - o Serving size
 - Number of doses
 - Public ingredients

Naming Items in the Statewide Track and Trace System

Per 19 CSR 100-1.130(1)(D), "Each licensee shall use the statewide track and trace system as its system of record to track marijuana product from seed or immature plant stage until the marijuana product is either purchased by a consumer, qualifying patient, or primary caregiver; expended during testing; or destroyed". This means Metrc, the statewide track and trace system, is each licensee's official system of record. As such, the system of record, Metrc, should accurately reflect each licensee's inventory at the end of each day, including work in progress marijuana products per 19 CSR 100-1.130(1)(F) and 19 CSR 100-1.130(1)(M). This means licensees shall name items in a manner that adequately identifies what marijuana products are in Metrc whether a marijuana product is in a process, a formulation or a final product.

For example, "Patch" or "Vape" does not adequately identify a marijuana product because these types of products come in a variety of milligrams and cannabinoid ratios, or this identifier could possibly indicate a formulation. Licensees should utilize identifying words to improve the ready identification of marijuana product, where applicable. If licensees do not use adequate identifiers in the various stages of production, the licensee will be required to make corrections. For more information, please reference the Missouri State Supplemental Guide – Adding Items.

Process Step/Status/Stage

Identify where a particular marijuana product is in a licensee's processes.

- Examples include, but are not limited to:
 - o Brookie Bar_100mg_Formulation
 - o Formulation: Cherry Bomb Distillate
 - Soft Gel Hemp and MCT 50/50 Oil 10mg each Formulation
 - Acme Eats Pressed Potions Love Potion 5mg Powder Formulation
 - CO₂ Distillate Heads
 - Winterized CO₂ Oil
 - o CO₂ Raw Extract
 - Distillate_Purged

- Distilled Mother Liquor 2nd Pass
- Untrimmed Buds: Golden Goat
- Golden Goat A Buds Trimmed
- Kief: Decarbed

Brand Name

Identify the brand for a particular marijuana product to help differentiate the item from similar products in a licensee's inventory.

- Examples include, but are not limited to:
 - o Acme Eats Brookie Bar 100mg 10ct
 - Acme Puffs_Cherry Bomb_Distillate_Formulation
 - o Acme Grows: 7q Prepacks: Golden Goat

Marijuana Product Name

Identify the individual marijuana product SKU for a particular brand to help differentiate the item from similar marijuana product SKUs in a licensee's inventory.

- Examples include, but are not limited to:
 - o Acme Eats Brookie Bar 100mg 10ct
 - Acme Puffs_ Caddy Carts_ Cherry Bomb_0.5g
 - o Acme Grows: 7g Prepacks: Golden Goat

Intended Total THC amount

Identify the intended total amount of THC in a particular marijuana product or marijuana product formulation.

- Examples include, but are not limited to:
 - Brookie Bar_100mg_Formulation
 - o Acme Eats Brookie Bar 100mg 10ct
 - o Acme Eats G.O.A.T. Gummies Purple Punch: 300mg 30ct

Unit Quantity

Identify the final marijuana product unit quantity.

- Examples include, but are not limited to:
 - o Acme Eats Brookie Bar 100mg 10ct
 - o Acme Eats G.O.A.T. Gummies Purple Punch: 300mg 30ct
 - Acme Puffs_Cherry Bomb Cartridge_o.5g
 - o Acme Grows: 7g Prepacks: Golden Goat

Flavor or Strain

Identify the marijuana product flavor or strain. Note: botanically derived terpenes blended to mimic a specific strain are a flavor and should not be identified as a strain.

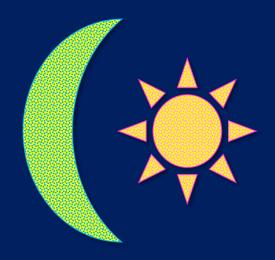
- Examples include, but are not limited to:
 - o Acme Eats Brookie Bar 100mg 10ct
 - o Acme Eats G.O.A.T. Gummies Purple Punch: 300mg 30ct
 - o Acme Grows: 7g Prepacks: Golden Goat
 - o Acme Puffs_Cherry Bomb_Distillate_Formulation



5. All marijuana product packaging design, including that for exit packaging, may only utilize—

A. Limited colors, including a primary color as well as up to two (2) logos or symbols of a different color or colors, whether images or text, including brand, licensee, or company logos, provided that the widest part of a logo or symbol is no wider than the length or height, whichever is greater, of the word "Marijuana" on the packaging; Packaging – Primary color, purple (R:204, G:153, B:255).





LOGO 1 LOGO 2

Logo 1 (Text) – Brand; Multiple colors; 4" x 1.5" (L x H) text box. Logo 2 (Symbol/Image) – Company logo; Multiple colors; 3" x 3" grouping box.

MARIJUANA

"Marijuana" – Required per 19 CSR 100-1.120(1)(C)1; Black or White font; 5" x 1.25" text box.

B. A product name; Black or White font; 4" x 1" text box.

Product Name

C. Text indicating side effects and behavioral effects of usage; Black or White font; 4" x 1" text box; not an opportunity to make health claims.

[Text indicating side effects and behavioral effects of usage]

D. A label required by this rule; Black and White label.

Label Required by Rule

E. A QR code linking to a website where a purchaser can learn more about the product; Black and White only; not an opportunity for another logo or image.



Appendix B -19 CSR 100-1.120(1)(C)1

- 1. Unless alternative placement of "Marijuana" or the universal symbol has been approved by the department, all marijuana product shall be clearly and conspicuously labeled with "Marijuana" printed at least as large as any other words used, as well as a prominently displayed universal symbol in red and white print that consists of the following: This means,
 - The universal symbol must be located on the principle display panel.
 - In addition to the rule requirement regarding the universal symbol, infused edibles must be in compliance with 195.805 RSMo. Therefore, the universal symbol shall measure one-half inch by one-half inch from point to point.
- A. A diamond containing the letters "THC";
- B. The letter "M" located under the "THC" within the diamond; and



C. For **infused products**, the number of milligrams of THC in the package, placed directly under the diamond.



Appendix C - 19 CSR 100-1.120(1)(C)2 & 3

- 2. Unless alternative placement of a label has been approved by the department, the marijuana product container closest to the product shall bear a label displaying only the following information, in the following order, from top to bottom and left to right:
 - A. All active and other ingredients, which shall not include groupings of ingredients that obscure the actual ingredients, such as "natural flavors" or "botanically derived terpenes" and shall include solvents used in the manufacturing process;
 - B. Servings and doses per package for marijuana licensees or doses per package for medical licensees;
 - C. A "best if used by" date;
 - D. The license number of the licensed entity from which the final marijuana product originated;
 - E. The testing licensee where the final marijuana product passed mandatory testing;
 - F. The statewide track and trace system tag number associated with the mandatory testing results for the final marijuana product;
 - G. The exact total weight of the marijuana included in the package;
 - (I) For dried, unprocessed marijuana, concentrates, prerolls, and infused prerolls, weight shall be listed in grams.
 - (II) For infused products other than infused prerolls, weight shall be listed by milligrams of delta 9 tetrahydrocannabinol.
 - H. The exact delta-9-tetrahydrocannabinol (Δ9-THC), delta-9-tetrahydrocannabinolic acid (Δ9-THCA), cannabidiol (CBD), cannabidiolic acid (CBDA), cannabinol (CBN), tetrahydrocannabivarin (THCV), cannabidivarin (CBDV), and delta 8 tetrahydrocannabinol (Δ8-THC) per serving/dose, listed in milligrams;
 - I. Results of terpene analysis, if tested during mandatory testing;
 - J. Instructions for Use;
 - K. Estimated length of time the serving or dosage will have an effect;
 - L. The department-issued product packaging approval number;
 - M. The following warning: "Cognitive and physical impairment may result from the use of marijuana. Keep out of reach of children."

ACTIVE AND INACTIVE INGREDIENTS

Blue Dream Marijuana Flower

MARIJUANA PRODUCT INFORMATION

Serving/Dose: 1 gram
Best If Used By: 01/01/20##
Produced By: CUL######
Tested By: TES######

Testing Tag: 1A40C0100000111000010101

Product Weight: 7 grams

CANNABINOID PROFILE

Δ9-THC: 2.99 mg/g

Δ9-THCa: 208.8 mg/g

CBD: 0 mg/g

CBDa: 0 mg/g

CBDa: 0 mg/g

Δ8-THC: 0 mg/g

TERPENE PROFILE

beta-Myrcene: 0.72% Linalool: 0.09% alpha-Pinene: 0.33% Caryophyllene: 0.09% beta-Pinene: 0.14% a-Humulene: 0.03% d-Limonene: 0.11% a-Bisabolol: 0.01%

INSTRUCTIONS AND LENGTH OF EFFECT

Heat 1 gram of flower to 392°F (200°C) and inhale vapor or smoke. Effects typically last 1-4 hours.

MARIJUANA PRODUCT APPROVAL NUMBER

[Code is generated when an item is approved]

WARNING

Cognitive and physical impairment may result from the use of marijuana. Keep out of reach of children.

ACTIVE AND INACTIVE INGREDIENTS

Blue Dream Marijuana Flower

MARIJUANA PRODUCT INFORMATION

Serving/Dose: 1 gram
Best If Used By: 01/01/20##
Produced By: CUL#####
Tested By: TES######

Testing Tag: 1A40C0100000111000010101

Product Weight: 7 grams

CANNABINOID PROFILE

Δ9-THC: 2.99 mg/g
Δ9-THCa: 208.8 mg/g
CBD: 0 mg/g
CBD: 0 mg/g
CBDa: 0 mg/g
CBDa: 0 mg/g
CBDa: 0 mg/g
Δ8-THC: 0 mg/g

TERPENE PROFILE

beta-Myrcene: 0.72% Linalool: 0.09% alpha-Pinene: 0.33% Caryophyllene: 0.09% beta-Pinene: 0.14% a-Humulene: 0.03% d-Limonene: 0.11% a-Bisabolol: 0.01%

INSTRUCTIONS AND LENGTH OF EFFECT

Heat 1 gram of flower to 392°F (200°C) and inhale vapor or smoke. *Effects typically last 1-4 hours.*

MARIJUANA PRODUCT APPROVAL NUMBER

[Code is generated when an item is approved]

WARNING

Cognitive and physical impairment may result from the use of marijuana. Keep out of reach of children.

ACTIVE AND INACTIVE INGREDIENTS

Medium Chain Triglyceride (MCT) Oil, Organic Hemp Seed Oil, Marijuana Tetrahydrocannabinol (THC) Isolate (Winterized CO2 marijuana oil (Ethanol), Hexane), Organic Lime Flavoring (Sunflower Seed Oil, Distilled Lime Terpenes), Rosemary Extract, Stevia.

MARIJUANA PRODUCT INFORMATION

Serving/Dose: 1 mL

Best If Used By: 01/01/20## Produced By: MAN###### Tested By: TES######

Testing Tag: 1A40C0100000111000010101

Product Weight: 503.2 milligrams

CANNABINOID PROFILE

 $\begin{array}{lll} \mbox{\Delta9-THC: } 33.55 \mbox{ mg/g} & \mbox{CBN: } 0 \mbox{ mg/g} \\ \mbox{\Delta9-THCa: } 0 \mbox{ mg/g} & \mbox{THCV: } 0 \mbox{ mg/g} \\ \mbox{CBD: } 0 \mbox{ mg/g} & \mbox{CBDV: } 0 \mbox{ mg/g} \\ \mbox{CBDa: } 0 \mbox{ mg/g} & \mbox{\Delta8-THC: } 0 \mbox{ mg/g} \\ \end{array}$

INSTRUCTIONS AND LENGTH OF EFFECT

Fill provided graduated dropper to 1 mL and dispense liquid under tongue. Hold for at least 30 seconds under the tongue and swallow. *Effects typically last 2-6 hours*.

MARIJUANA PRODUCT APPROVAL NUMBER

[Code is generated when an item is approved]

WARNING

Cognitive and physical impairment may result from the use of marijuana. Keep out of reach of children.

ACTIVE AND INACTIVE INGREDIENTS

Medium Chain Triglyceride (MCT) Oil, Organic Hemp Seed Oil, Marijuana Tetrahydrocannabinol (THC) Isolate (Winterized CO2 marijuana oil (Ethanol), Hexane), Organic Lime Flavoring (Sunflower Seed Oil, Distilled Lime Terpenes), Rosemary Extract, Stevia.

MARIJUANA PRODUCT INFORMATION

Serving/Dose: 1 mL Best If Used By: 01/01/20## Produced By: MAN##### Tested By: TES######

Testing Tag: 1A40C0100000111000010101 **Product Weight:** 503.2 milligrams

CANNABINOID PROFILE

Δ9-THC: 33.55 mg/g

Δ9-THCa: 0 mg/g

CBD: 0 mg/g

CBD: 0 mg/g

CBDa: 0 mg/g

Δ8-THC: 0 mg/g

INSTRUCTIONS AND LENGTH OF EFFECT

Fill provided graduated dropper to 1 mL and dispense liquid under tongue. Hold for at least 30 seconds under the tongue and swallow. *Effects typically last 2-6 hours*.

MARIJUANA PRODUCT APPROVAL NUMBER

[Code is generated when an item is approved]

WARNING

Cognitive and physical impairment may result from the use of marijuana. Keep out of reach of children.

- 3. Marijuana seeds and plants shall be clearly and conspicuously labeled with "Marijuana" printed at least as large as any other words used on the packaging and a universal symbol designed as described in this rule.
 - A. Marijuana seed packaging must bear a label with the strain information.

MARIJUANA PRODUCT INFORMATION

Strain: Blue Dream

B. Marijuana plant packaging must bear a label with the strain information and propagation date.

MARIJUANA PRODUCT INFORMATION

Strain: Blue Dream

Propagation Date: 01/01/20##

Glossary of Terms

Administer

Means the direct application of marijuana by way of any of the following methods:

- Ingestion of capsules, teas, oils, and other marijuana-infused products;
- Vaporization or smoking of dried flowers, buds, plant material, extracts, oils, and other marijuana-infused products;
- Application of ointments or balms;
- Transdermal patches and suppositories;
- Consuming marijuana-infused food products; or
- Any other method recommended by a qualifying patient's physician or nurse practitioner

Final Marijuana Product

Means marijuana product that is intended for human use and includes all ingredients whether or not the ingredients contain cannabinoids. Where marijuana will be sold in a method of administration, the marijuana product must be processed into its method of administration before it is a final marijuana product.

Harvest Lot

A specifically identified quantity of marijuana that is uniform in strain, cultivated utilizing the same growing practices, harvested within a seventy-two- (72-) hour period at the same location, and cured under uniform conditions.

 Note: Per 19 CSR 100-1.110(5)(B)1, the maximum amount of dry, unprocessed marijuana from which a harvest lot sample may be selected is fifteen pounds (15 lbs.). Meaning if a licensee wants to send any item category of dry, unprocessed marijuana applicable to mandatory testing the package should be no greater than fifteen (15) pounds.

Homogeneity

Means the amount of cannabinoids within a marijuana product being consistent and reasonably equally dispersed throughout the marijuana product, including each portion of the marijuana product.

Infused Preroll

Means a consumable or smokable marijuana product, generally consisting of:

- Wrap or paper;
- Dried flower, buds, and/or plant material; and
- A concentrate, oil, or other type of marijuana extract, either within or on the surface of the product.

Infused prerolls may or may not include a filter or crutch at the base of the product.

Licensee

Means an entity licensed or issued a certificate by the department to operate a medical or marijuana facility under Article XIV of the Missouri Constitution.

Mandatory Test

Means a test required before a marijuana product can be sold to consumers, qualifying patients, or primary caregivers.

Marijuana or Marihuana

Cannabis indica, Cannabis sativa, and Cannabis ruderalis, hybrids of such species, and any other strains commonly understood within the scientific community to constitute marijuana, as well as seeds, clones, and resin extracted from the marijuana plant. Marijuana or Marihuana does not include industrial hemp as defined by Missouri statute, or commodities or products manufactured from industrial hemp.

Marijuana-Infused Products

Products that are infused, dipped, coated, sprayed, or mixed with marijuana or an extract thereof, including, but not limited to, products that are able to be vaporized or smoked, edible products, ingestible products, topical products, suppositories, and infused prerolls.

Marijuana Product

Marijuana, marijuana-infused products, or other products made using marijuana, including prerolls.

Method of Administration

Means the tool(s) used to administer marijuana product.

Preroll

Means a consumable or smokable marijuana product, generally consisting of:

- A wrap or paper; and
- Dried flower, buds, and/or plant material.

Prerolls may or may not include a filter or crutch at the base of the product.

Process Lot

Once production is complete, any amount of marijuana concentrate or marijuana extract of the same type and processed using the same extraction methods, standard operating procedures, and harvest lots; or any amount of marijuana-infused product or prerolls of the same type and processed using the same ingredients, standard operating procedures, and harvest lots.

Product Category

Means a defined group of marijuana products that are in the same form, such as flower, concentrates, and infused products. Broad product categories may be further broken down into additional product categories such as vape cartridges and shake/trim.

Unit for Sale

Means an individual package of marijuana product intended to be sold to a consumer, qualifying patient, or primary caregiver.

Division of Cannabis Regulation Contact Information

For questions or feedback regarding packaging, labeling, and product design compliance or the Item Approval process, email CannabisProductCompliance@health.mo.gov.

Licensees can find additional information on our website: https://health.mo.gov/safety/cannabis/facility-comms-quidance.php